

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**IN RE ANDROGEL ANTITRUST
LITIGATION (II)**

CASE NO. 1:09-MD-2084-TWT

**DIRECT PURCHASER CLASS
ACTIONS**

**DIRECT PURCHASER
INDIVIDUAL ACTIONS**

**ROCHESTER DRUG CO-OPERATIVE,
INC., ET AL.,**

Plaintiff,

v.

**UNIMED PHARMACEUTICALS,
INC., ET AL.**

Defendants.

CASE NO. 1:09-CV-956-TWT

**LOUISIANA WHOLESALE DRUG
CO., INC., ET AL.,**

Plaintiff,

v.

**UNIMED PHARMACEUTICALS,
INC., ET AL.**

Defendants.

CASE NO. 1:09-CV-957-TWT

**MEIJER, INC., ET AL.,
Plaintiffs,**

v.

**UNIMED PHARMACEUTICALS,
INC., ET AL.**

Defendants.

CASE NO. 1:09-CV-958-TWT

**STEPHEN L. LAFRANCE PHARMACY,
INC. ET AL.**

Plaintiff,

v.

**UNIMED PHARMACEUTICALS,
INC., ET AL.**

Defendants.

CASE NO. 1:09-CV-2913-TWT

**RITE AID CORPORATION, ET AL.,
Plaintiffs,**

v.

**UNIMED PHARMACEUTICALS, INC.,
ET AL.**

Defendants.

CASE NO. 1:09-CV-2776-TWT

**WALGREEN CO., ET AL.,
Plaintiffs,**

v.

**UNIMED PHARMACEUTICALS,
LLC, ET AL.**

Defendants.

CASE NO. 1:09-CV-3019-TWT

**SUPERVALU, INC.,
Plaintiff,**

v.

**UNIMED PHARMACEUTICALS,
LLC, ET AL.
Defendants.**

CASE NO. 1:10-CV-1024-TWT

**DECLARATION OF REBECCA VALENTINE IN SUPPORT OF
SOLVAY'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL
DEFENDANTS TO PRODUCE WITNESSES ON
PATENT MERITS ISSUES FOR DEPOSITIONS**

I, Rebecca Valentine, upon personal knowledge or information and belief, declare as follows:

1. I am an associate at the law firm of Mayer Brown LLP, counsel for Defendants Abbott Products, Inc. f/k/a Solvay Pharmaceuticals, Inc. and Unimed Pharmaceuticals, LLC (collectively, "Solvay") in the above captioned matter.
2. I submit this declaration to provide the Court with true and accurate copies of documents in support of Solvay's Opposition to Plaintiffs' Motion to Compel Defendants to Product Witnesses on Patent Merits Issues for Deposition.
3. Attached hereto as Exhibit A is a true and accurate copy of an email sent by Counsel for Solvay to Plaintiffs on April 12, 2011.
4. Attached hereto as Exhibit B is a true and accurate copy of an email sent by Counsel for Plaintiffs to Solvay on April 20, 2011.

5. Attached hereto as Exhibit C is a true and accurate copy of a letter sent by Counsel for Solvay to Plaintiffs on March 8, 2011 objecting to patent merits depositions until resolution of the expert and counsel disqualification issue and offering to proceed with depositions of witnesses regarding other issues.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of April, 2011, at Washington, D.C.



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